

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZUMA PRESS, INC., ACTION SPORTS
PHOTOGRAPHY, INC., TIYU (BEIJING)
CULTURE MEDIA CO. LTD., MANNY
FLORES, ANDREW DIEB, CHRISTOPHER
SZAGOLA, LOUIS LOPEZ, CHARLES BAUS,
DUNCAN WILLIAMS, ROBERT BACKMAN,
JOHN MIDDLEBROOK, and ANTHONY
BARHAM,

Plaintiffs,

v.

GETTY IMAGES (US), INC.

Defendant.

Case No.: 1:16-cv-06110 (AKH)

**MEMORANDUM IN SUPPORT
OF MOTION FOR LEAVE TO
FILE EXHIBIT UNDER SEAL**

Pursuant to Section 4.B.1 of the Court’s Individual Rules, Defendant Getty Images (US), Inc. (“Getty Images”) moves for permission to file under seal Exhibit Q to the Declaration of Jonathan Bloom in Support of Getty Images (US), Inc.’s Opposition to Plaintiffs’ Motion for Leave To Amend the Second Amended Complaint, dated February 20, 2018. As explained in the accompanying Declaration of Benjamin Marks, Exhibit Q is a copy of a confidential agreement between Getty Images and non-party Les Walker, effective April 1, 2016, Bates-numbered GETT00051389-93. Getty Images seeks to redact from the public record only the portion of the first page of the document headed “Commercial Terms” that contains the commercial terms of an individual contributor agreement that Getty Images considers to be competitively sensitive. *See Refco Group Ltd., LLC v. Cantor Fitzgerald, L.P.*, No. 13 Civ. 1654 (RA)(HBP), 2015 WL 4298572 (S.D.N.Y. July 15, 2015) (granting motion to redact license agreement).

Dated: New York, New York
February 20, 2018

Respectfully submitted,

By: /s/ Benjamin E. Marks
Benjamin E. Marks
Jonathan Bloom

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Tel: (212) 310-8000
Fax: (212) 310-8007

*Attorneys for Defendant Getty Images
(US), Inc.*